

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

1) PINNACLE PACKAGING COMPANY,)
INC., an Oklahoma corporation,)
2) POLO ROAD LEASING, LLC, an Okla-)
homa limited liability company, and)
3) J. SCOTT DICKMAN,)

Plaintiffs,)

vs.)

Case No. 12-CV-537-GKF-TLW

4) ONE EQUITY PARTNERS LLC, a)
Delaware limited liability company, and)
5) CONSTANTIA FLEXIBLES GmbH, an)
Austrian corporation,)

Defendants.)

UNOPPOSED MOTION FOR ENLARGEMENTS OF TIME

The Plaintiffs, Pinnacle Packaging Company, Inc., Polo Road Leasing, LLC, and J. Scott Dickman (collectively “Plaintiffs”), hereby move (1) for an enlargement of time from Friday, December 7, 2012, to and including December 28, 2012, to respond to *Defendant One Equity Partners LLC’s Motion to Dismiss and Brief in Support* and *Defendant Constantia Flexibles GmbH’s Motion to Dismiss and Brief in Support* (the “Motions”); and for an enlargement of time from Friday, December 7, 2012, to and including December 28, 2012 for Plaintiffs to file any amendment to their Complaint pursuant to Rule 15(a)(1)(B) Fed.R.Civ.P. In support of this Motion, Plaintiffs show the Court:

1. The Defendants have no objection to the enlargements requested hereby.
2. The enlargements are requested because of the difficulties of responding to two separate motions given the Thanksgiving holidays, Scott Dickman’s absence out the country for a portion of the response period, and because Plaintiffs may determine to amend their Complaint. The

parties have also discussed conducting certain jurisdictional discovery.

3. Granting this Motion will not affect any dates in this case, as none have been scheduled.

4. No previous motions for enlargement have been made.

WHEREFORE, Plaintiffs respectfully request that this Motion be granted and that they be given other just and appropriate relief.

s/Laurence L. Pinkerton

Laurence L. Pinkerton, OBA #7168

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on December 6th, 2012, I electronically transmitted the foregoing pleading, to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

John D. Russell, Esq.
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/s/ Laurence L. Pinkerton